

William P. Ramey, III (appearance *pro hac vice*)

wramey@rameyfirm.com

RAMEY LLP

5020 Montrose Blvd., Suite 800

Houston, Texas 77006

Telephone: +1.713.426.3923

Facsimile: +1.832.689.9175

Susan S.Q. Kalra, Bar No. 167940

susan@rameyfirm.com

RAMEY LLP

303 Twin Dolphin Drive, Suite 600

Redwood City, California 94065

Telephone: +1.800.993.7499

Facsimile: +1.832.689.9175

**Attorneys for Defendant**

***LAURI VALJAKKA***

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION**

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

Case No. 4:22-cv-01490-JST

**DECLARATION OF WILLIAM  
RAMEY IN SUPPORT OF  
NETFLIX'S ADMINISTRATIVE  
MOTION TO CONSIDER  
WHETHER ANOTHER PARTY'S  
MATERIAL SHOULD BE SEALED**

Judge: Jon S. Tigar

I, William P. Ramey, III, declare as follows:

1. My name is Willim Ramey. I am over 18 years of age, and have personal knowledge of the facts set forth in this declaration. I make this declaration in support of Netflix's Administrative Motion to Consider Whether Another Party's Material Should be Sealed. I am an attorney for Lauri Valjakka and understand the

sensitive nature of the materials sought to be sealed.

2. I respectfully request this Court grant Netflix's Administrative Motion To Consider Whether Another Party's Material Should Be Sealed and approve Netflix's proposed documents and portions of documents to be sealed outlined therein.

3. Compelling reasons and good cause exist to redact the exhibits and portions of the motions. Those documents contain confidential information including information from confidential settlements of prior litigation.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on this 3<sup>rd</sup> day of September, 2023. Executed on this day on the 3<sup>rd</sup> day of September, 2023 in Harris County, Texas.

Dated: September 3, 2023

/s/ William P. Ramey, III  
William P. Ramey, III